

FILED 15 MAR '23 10:20 USDC-ORF

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

Portland DIVISION

Stella Artois Santarelli

\_\_\_\_\_  
*(Enter full name of plaintiff)*

Plaintiff,

v.

Civil Case No: 3:23-cv-00376-AN

(to be assigned by Clerk's Office)

COMPLAINT FOR VIOLATION OF CIVIL  
RIGHTS (PRISONER COMPLAINT)

Multnomah County Federal Court;

Metropolitan Public Defenders Office;

Portland Police Bureau,

& Garrett Hemmerlein.

\_\_\_\_\_  
*(Enter full name of ALL defendant (s))*

Jury Trial Demanded

Yes

☒ No

## I. PARTIES

*List your name, address, and telephone number below, and the same information for each defendant. Make sure that the defendant(s) listed below are identical to those contained in the caption of the complaint. Attach additional sheets of paper if necessary.*

### Plaintiff

Name: Stella Artois Santarelli  
Street Address: 650 S Lowell St, Unit 337  
City, State & Zip Code: Portland, Oregon, 97239  
Telephone No.: 971-287-1752

**Defendant No. 1** Name: Multnomah County Federal Court  
Street Address: 1000 SW 3rd Ave #740,  
City, State & Zip Code: Portland, Oregon 97204  
Telephone No.: 503.326.8000

**Defendant No. 2.** Name: Metropolitan Public Defenders Office  
Street Address: 630 SW 5<sup>th</sup> Ave #500  
City, State & Zip Code: Portland, Oregon 97204  
Telephone No.: 503.225.9100

**Defendant No. 3.** Name: Portland Police Bureau - (Garrett Hemmerlein).  
Street Address: 1111SW 2<sup>nd</sup> Ave.  
City, State & Zip Code: Portland, Oregon 97204  
Telephone No.: 503.823.3333

## II. BASIS FOR JURISDICTION

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. You are bringing suit against (*check all that apply*):

- ☒ Federal officials (a *Bivens* claim)
- ☒ State or local officials (a § 1983 claim)

B. What federal constitutional, statutory, or treaty right(s) is/are at issue?

- Two Constitutional Rights is/are at issue, that I'm aware of - follows as listed: the 14<sup>th</sup> and 16<sup>th</sup> Amendment.
- In addition to a multitude, of other civil rights is/are at issues, needing to be thoroughly examined and considered, as this is a complex matter; due to the nature of the incident and individual (Stella Artois Santarelli) accused of committing several charges on 01.14.2022.

## III. STATEMENT OF CLAIMS Claim I

*State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.*

### **Portland Police Bureau - (Garrett Hemmerlein)**

- *The defendants violated a multitude of my Civil Rights on 01.14.2022, throughout the duration of my imprisonment, and during the due process of court, leading up to the cases dismissal. When I was initially pulled over, it was by Hemmerlein's partner; then moments later – Officer Hemmerlein arrived and step out of his vehicle and ran toward mine. Although, randomly came to a stop and pulled out his firearm and aimed it at me. I attempted to hold my composer but when thinking of the reality of the*

*position I was placed in; logically I knew the likelihood of me being murdered was unfortunately rising, exponentially.*

- On or about January 14<sup>th</sup>, 2022; I Stella Artois Santarelli, was lured out of my home by the authorities and deceived into committing multiple crimes, starting with Driving While License Suspended and being chased in my partners vehicle. Regarding a Road Rage Incident, that I was a victim of earlier that day, Officer Hemmerlein informed me by phone, during our second call - that a witness called in, supporting and confirming my statement. Officer Hemmerlein then stated he needed me to meet him in person, so he could match my face to my ID; resulting in finding myself being chased, humiliate and assaulted with Officer Hemmerlein's patrol vehicle.

- The chase concluded with myself being pulled by each arm, by each responding officer, out of the driver side window, of my SUV. As it remained in drive and rolled into, then was pinned up against a light pole, where the assisting officer, switched the gear into park. Including a sanction of twenty days in jail, as a probation violation due to contact with law enforcement and new charges. With the potential to stand trial, I was placed under the additional supervision, of Pre Trial-Services.

- Which may or may not, have all been incited by my partner; we have an IPV situation we've been working on. He has a habit of punishing me from time to time, and in this case - it was likely backlash; since I was considering, leaving him. Which has yet to be revealed, although I'm aware he's sleeping with other tenants in my apartment building. He picks them up and brings them back, as he comes and goes from my apartment unit. They communicate by the phone and desktop application Teams, by text, and via email, as these are the communication services - he uses most often when he is visiting, other than random phone calls. I believe he signals to them by saying phrases like (I want to go; I don't want to be here; You're falsely imprisoning me;) then psychical harm, threats, and more physical harm. Doing so, by initiating an argument, then threatening to leave me, concluding with physical violence.

Thanks in advance,

Injuries suffered as a result:

Documentation provided as an attachment, has been included.

## Claim II

*State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.*

by the authorities and deceived into committing multiple crimes, starting with Driving While License Suspended and being chased in my partners vehicle. Regarding a Road Rage Incident, that I was a victim of earlier that day. Officer Hemmerlein - informed me by phone during our second call, that a witness called in, supporting and confirming my statement. Officer Hemmerlein then stated, he needed me to meet him in person, so he could match my face to my ID; resulting in finding myself being chased, humiliate and assaulted with Officer Hemmerlein's patrol vehicle.

- On or about January 14<sup>th</sup>, 2022, I Stella Artois Santarelli, was lured out of my home

*\* Multnomah County Federal Court; on 01.14.2022 and again on 03/31/2022. (By allowing the plaintiff to be detained and wrongly fully imprisoned for 20 days; as a probation violation following their Misconduct.)*

### Injuries suffered as a result:

*Documentation provided as an attachment, has been included.*

## Claim III

*State here as briefly as possible the facts of your case. Describe how each defendant was involved, when the conduct occurred, and any injuries you have suffered as a result. It is not necessary to give any legal arguments or cite any cases or statutes.*

- On or about January 14<sup>th</sup>, 2022, I Stella Artois Santarelli, was lured out of my home

by the authorities and deceived into committing multiple crimes, starting with Driving

While License Suspended and being chased in my partners vehicle. Regarding a Road Rage Incident, that I was a victim of earlier that day. Officer Hemmerlein - informed me by phone during our second call, that a witness called in, supporting and confirming my statement. Officer Hemmerlein then stated, he needed me to meet him in person, so he could match my face to my ID; resulting in finding myself being chased, humiliate and assaulted with Officer Hemmerlein's patrol vehicle.

*\* **Metropolitan Public Defenders Office**; on 03.31.2022; (In Court as they'd yet to provide console and completed - a secret indictment; while also violating the 14<sup>th</sup> and 16<sup>th</sup> Amendments.)*

**Injuries suffered as a result:**

*Documentation provided as an attachment, has been included.*

*(If you have additional claims, describe them on another piece of paper, using the same outline.)*

**V. EXHAUSTION OF ADMINISTRATIVE REMEDIES**

☒ Yes

☐ No

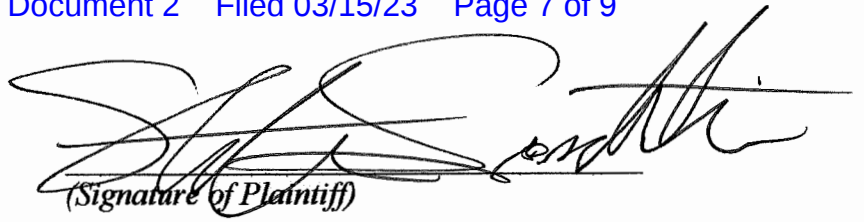
**V. RELIEF**

*\* State briefly exactly what you want the court to do for you and the amount, if any, of monetary compensation you are seeking. Make no legal arguments. Cite no cases or statutes.*

I'd like to kindly request, at minimum  
\$650,000; as compensation.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 29<sup>th</sup> day of May 2022.



(Signature of Plaintiff)

- Attached, I've included documentation that should verify and provide validation, to the honorable judge; whom reviews these documents. That my late submission, was due to being preoccupied by my attempts to flee Domestic Violence; with an underlying source, of Human Trafficking.



50 S Lowell St,  
apt 337  
Portland, OR, 97239

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District of Oregon  
Portland Division.  
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# 740 Portland, Oregon  
97204

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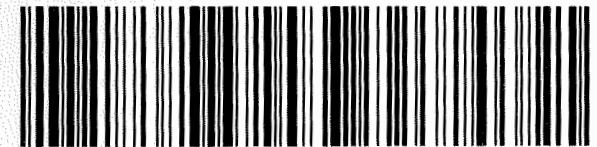
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